

1 KEITH E. EGGLETON, State Bar No. 159842  
2 Email: keggleton@wsgr.com  
3 DALE R. BISH, State Bar No. 235390  
4 Email: dbish@wsgr.com  
5 WILSON SONSINI GOODRICH & ROSATI  
6 Professional Corporation  
650 Page Mill Road  
7 Palo Alto, CA 94304-1050  
8 Telephone: (650) 493-9300  
9  
10 Attorneys for Defendants  
11 Western Digital Corporation

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

JAMES RAAYMAKERS, individually and on  
behalf of all others similarly situated,

Plaintiff,  
v.

WESTERN DIGITAL CORPORATION, a  
Delaware corporation,

Defendant.

CASE NO.: 5:20-cv-04091-SVK

**JOINT STIPULATION TO EXTEND THE  
DATE FOR DEFENDANT TO RESPOND  
TO OPERATIVE COMPLAINT**

Plaintiff James Raaymakers (“Plaintiff”) and Defendant Western Digital Corporation (“Defendant”) (collectively, “the parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on June 19, 2020, Plaintiff commenced this action by filing the original Complaint;

WHEREAS, the parties intend to seek consolidation of this matter with the related action, *Malone v. Western Digital Corp.*, Case No. 5:20-cv-03584-NC, which is also currently pending within this district, that would likely result in the filing of an amended and consolidated complaint;

1           WHEREAS, Defendant was served with the operative complaint on June 26, 2020 and,  
2 absent extension of Defendant's deadline to file a responsive pleading, Defendant's response to  
3 the complaint is currently due on or before July 17, 2020;

4           WHEREAS, the parties to this stipulation have conferred and agreed to an extension of  
5 time for Defendant to respond to allow the parties to seek consolidation the matters and thereby  
6 avoid duplicative effort, unnecessary motion practice, and result in a waste of judicial resources;

7           WHEREAS, in consideration of preserving resources and to promote efficiency, the parties  
8 have conferred and agree to extend the deadline for Defendant to answer or otherwise respond to  
9 the current complaint until August 24, 2020;

10          WHEREAS, the parties further agree that, in the event the Court consolidates the present  
11 action with *Malone* that results in the filing of a consolidated and amended complaint, Defendant's  
12 response to that complaint shall be due thirty (30) days after the filing of such complaint;

13          WHEREAS, Civil Local Rule 6-1(a) provides that parties may stipulate in writing, without  
14 a Court order, to extend the time within which to answer or otherwise respond to a complaint,  
15 provided the change will not alter the date of any event or any deadline already fixed by Court  
16 order;

17          WHEREAS, the stipulated extensions will not impact any deadline or date previously fixed  
18 by Court order;

19          NOW, THEREFORE, pursuant to Civil Local Rule 6-1(a), and with Defendant and  
20 Plaintiff reserving all rights and defenses, the parties respectfully agree that (1) the time for  
21 Defendant to respond to the current complaint is extended to August 24, 2020 and (2) if  
22 consolidation is granted, Defendant's response to the consolidated and amended complaint is due  
23 thirty (30) days after the filing of such complaint.

24          **IT IS SO STIPULATED.**

25

26

27

28

1 Dated: July 15, 2020

Respectfully submitted,

2  
3 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

4 By: */s Keith E. Eggleton*  
5 KEITH E. EGGLETON

6 Attorneys for Defendant  
7 WESTERN DIGITAL CORPORATION

8  
9 Dated: July 15, 2020

Respectfully submitted,

10 BURSOR & FISHER, P.A.

11 By: */s Timothy Fisher*  
12 L. TIMOTHY FISHER

13 Attorneys for Plaintiff  
14 JAMES RAAYMAKER

15  
16  
17  
18  
19 ATTORNEY ATTESTATION

20 Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that  
21 concurrence in the filing of the document has been obtained from each of the other Signatories.  
22  
23

24 */s Keith E. Eggleton*  
25 Keith E. Eggleton  
26  
27  
28